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April 27, 2020

TO: UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
PART I – EMERGENCY CIVIL PART

VIA ECF

RE: KDH CONSULTING GROUP LLC V. ITERATIVE CAPITAL MANAGEMENT L.P. ET AL.
20-cv-03274 | LETTER MOTION TO SEAL

Your Honor:

I am a counsel of record for the Plaintiff KDH Consulting Group LLC (“Plaintiff”) in the above-referenced matter and I respectfully submit this letter motion (“Letter Motion”) to file TRO exhibits under seal.

As alleged in the Verified Complaint, this action arises out of the Defendants’ fraud and other misconduct relating to the Plaintiff’s investment into the Defendants’ private investment fund and the fund’s investment activities; accordingly, the fund’s offering documents are not generally available to the public and may contain confidential and sensitive information. Also, the Plaintiff may be bound by the limited partnership agreement with the fund to keep confidential any information or matter relating to the fund and its affairs.

The Declaration of Wayne Hatami with Exhibits that Plaintiff proposes to file under seal will be filed separately.

Considering the urgency of the matter explained in the accompanying Plaintiff's emergency application, Plaintiff respectfully asks the Court to grant this Letter Motion.

Per the emergency COVID protocol, I can be reached at any time at my cell at 646-764-1630

Sincerely,


Rika Khurdayan